

COOLEY LLP  
BEN HUR (224018)  
(bhur@cooley.com)  
SIMONA AGNOLUCCI (246943)  
(sagnolucci@cooley.com)  
EDUARDO SANTACANA (281668)  
(esantacana@cooley.com)  
JOSHUA ANDERSON (312836)  
(joshua.anderson@cooley.com)  
TIFFANY LIN (321472)  
(tiffany.lin@cooley.com)  
HARRIS MATEEN (335593)  
(hmateen@cooley.com)  
3 Embarcadero Center, 20th Floor  
San Francisco, California 94111-4004  
Telephone: +1 415 693 2000  
Facsimile: +1 415 693 2222

Attorneys for Defendant  
GOOGLE LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JOHN DOE I, et al., on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:23-cv-02431-VC  
(Consol. w/ 3:23-cv-02343-VC)

**JOINT ADMINISTRATIVE MOTION TO  
CLOSE THE COURTROOM AT THE  
OCTOBER 21, 2025 DISCOVERY HEARING**

Date: October 21, 2025  
Time: 10:00 a.m.  
Ctrm.: 6

District Judge Susan Van Keulen  
San Francisco Courthouse, Ctrm. 6

Pursuant to the Local Rule 7-11, Defendant Google LLC (“Google”) respectfully submits this Joint Administrative Motion to close the Courtroom during the October 21, 2025 hearing regarding the Parties Joint Statement of Discovery Dispute re: RFP Nos. 6 and 20 (“Joint Discovery Dispute”). Plaintiffs join in making this request for relief.<sup>1</sup>

Courts frequently deny public access to judicial proceedings when disclosure of confidential commercial information could “harm a litigant’s competitive standing.” *See Nixon v. Warner Communications, Inc.*, 435 U.S. 589, 598 (1978); *see also Kamakana v. City and County of Honolulu*, 447 F. 3d 1172, 1180 (9th Cir. 2006); *New York v. Microsoft Corp.*, 2002 WL 1315804 (D.D.C. 2002); *Standard & Poor’s Corp., Inc. v. Commodity Exchange, Inc.*, 541 F. Supp. 1273, 1277 (S.D.N.Y. 1982) (“the right to attend judicial proceedings should, in appropriate circumstances, give way to the right to protect one’s trade secrets”). The Court should do the same here.

The 23 identifiers (in re RFP no. 6) and 25 sources (in re RFP no. 20) identified by Plaintiffs that will be the subject of this hearing (*see* Dkt. 223) were filed under seal pursuant to the Joint Stipulation and Order for Omnibus Motion to Seal for the reasons stated in the Joint Stipulation. Dkt. 221.

The Parties anticipate that these highly confidential terms and internal system names filed under seal will be discussed at the October 21, 2025 hearing. Those materials contain non-public, highly sensitive and confidential business information, disclosure of which could affect Google’s competitive standing and may expose Google to increased security risk.

Moreover, the issues to be discussed at the hearing pertain only to discovery and are not necessary to the public’s understanding of the underlying dispute in this litigation. The Parties therefore respectfully request that the Court grant this joint Motion to close the Courtroom during the October 21, 2025 hearing.

---

<sup>1</sup> Plaintiffs join the motion because it will be nearly impossible to discuss the key issues on the underlying motion to compel without also mentioning things that Google seeks to keep under seal. Plaintiffs do not challenge any of those items at this time but reserve the right to challenge sealing of Google’s identity linking systems at future points in the case.

1 Dated: October 13, 2025

COOLEY LLP

2  
3 By: /s/ Eduardo E. Santacana

4 Ben Hur  
5 Simona Agnolucci  
6 Eduardo Santacana  
7 Joshua Anderson  
8 Tiffany Lin  
9 Harris Mateen

10 Attorneys for Defendant  
11 GOOGLE LLC

12 Dated: October 13, 2025

SIMMONS HANLY CONROY, LLC

13 By: /s/ Jason Barnes

14 Jason 'Jay' Barnes  
15 Eric Johnson  
16 An Truong

17 Attorneys for Plaintiffs  
18 JOHN DOE et al.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: October 13, 2025

COOLEY LLP

By: /s/ Eduardo E. Santacana

Ben Hur  
Simona Agnolucci  
Eduardo Santacana  
Joshua Anderson  
Tiffany Lin  
Harris Mateen

Attorneys for Defendant  
GOOGLE LLC